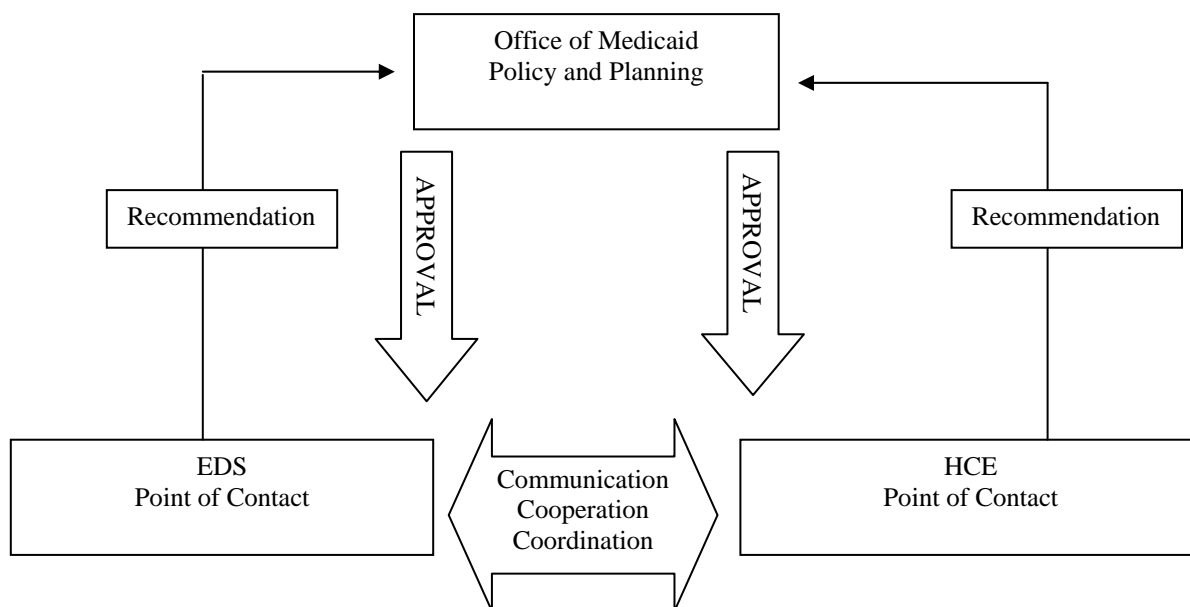


## II. ORGANIZATIONAL STRUCTURE AND STAFFING

The SUR department will coordinate activities with the other operations departments at Health Care Excel—PA and MP—with EDS and other Indiana Health Coverage Programs contractors, and the State. There will be regular meetings to establish and monitor goals and objectives, evaluate processes, and to work together to affect improvements in the program. The figure below represents the flow of information among EDS, HCE, and the State, the principal partners in this process.

**Figure II – 1  
COMMUNICATION, COOPERATION, AND COORDINATION**



### A. Organizational Structure and SUR Staff

The SUR department has been staffed to ensure the fulfillment of its functions and to provide optimal customer service to the State, providers, and IHCP members. The SUR staff consists of a Director, Supervisors, Data Analyst, Program Integrity Specialists, Program Integrity Coordinator, SUR Reviewers, Prepayment Reviewer, Prepayment Review Coordinator, Recoupment Specialist, Member Restricted Card Reviewers and Specialists, and Support Staff. (**Refer to Exhibit II – 1.**) All staff must achieve and maintain performance standards, and meet or exceed the position qualifications established by the State and HCE. The Quality Management Plan delineates internal monitoring processes and performance standards.

The Quality Management Plan provides the framework for initial and continuing education. Of particular importance is the need for continuing education on the appropriate health care and delivery systems that support the objectives of the IHCP. Another area of importance is a competent functional understanding of the relevant

aspects of IndianaAIM, which is a common bond among all stakeholders and contractors. The Program Director will provide ongoing support to help identify and address the need for staff education.

## **B. Staff Responsibilities**

The **SUR Director** is responsible for optimal functioning of the department to ensure that the department achieves the objectives established in the contract on behalf of the IHCP. The SUR Director oversees provider and member claims analyses to identify fraudulent or abusive behavior, and is responsible for the overall function of the department to ensure that it achieves its goals. The Director has an extensive background in Health Information Administration and Surveillance and Utilization Review. The SUR Director is responsible for Audit Systems and Audit Contractor Coordination meeting preparation. The SUR Director serves as a member of the Operations Assessment Committee. The SUR Director has been delegated the responsibility for managing the production of the SUR department and routinely reports achievements, areas of concerns, and recommendations to the Program Director.

The **SUR Supervisors** serve as liaisons between the SUR staff and the SUR Director as well as between provider and member communities and stakeholders. They monitor adherence to OMPP requirements and are responsible for continuous improvement in the quality of work performed by SUR staff. The Supervisors are responsible for the development and maintenance of procedure manuals documenting SUR processes. Supervisors are also responsible for all required reporting activities and must remain knowledgeable of procedural and diagnostic coding systems. They manage the daily review function activities to achieve SUR objectives. The SUR Supervisors have been delegated the responsibility for oversight of SUR staff and are accountable for timely production of SUR work products that meet high quality standards. The Supervisors routinely report achievements, areas of concern, and recommendations to the SUR Director.

The **Data Analyst** provides system support to perform activities relating to SUR business functions. The Data Analyst functions as the department expert in Structured Query Language (SQL) and other software. The Analyst is also responsible for the generation of all SUR reports. The Analyst is responsible for the development and maintenance of the SUR Database to ensure accurate data collection. The Data Analyst assists staff in the methodological design, development, and implementation of focused utilization studies and other case identification and development activities. The Data Analyst assists with the generation of reports and timely tracking of information. The Data Analyst reports to the SUR Director on progress and areas of concern.

The **Program Integrity Specialists and Coordinator** are responsible for preparing and maintaining the profiling subsystem to identify aberrant behavior patterns. The Program Integrity Staff also assist in the accuracy and timeliness of all tracking and topic-linking subsystems. They prepare research and documentation for all member and provider SUR hearings and appeal activities. The Program Integrity Staff research all referrals received by the SUR Department, recommend case development when appropriate, and make referrals to other entities when warranted. SUR supports one Program Integrity Specialist currently pursuing the Certified Fraud Examiner credential.

The **SUR Reviewers** perform provider and member off-site (at the Health Care Excel) and on-site (at the facility) reviews. They identify aberrant activity through review of medical records and are responsible for preparing reports and recommendations subsequent to the reviews. The Reviewers work closely with the provider community to conduct reviews and provider education.

SUR Reviewers are assigned the responsibility of assuring that the staff disseminates only high-quality written materials. Reviewers assist in creating and maintaining department documents and manuals in an organized, thorough, and accurate manner. SUR Reviewers report to the appropriate SUR Supervisor on progress and areas of concern.

The **Prepayment Reviewer and Coordinator** work closely with EDS and the providers that are placed on prepayment review to improve program compliance. The Prepayment Review Staff adjudicate provider claims to ensure appropriate claim adjudication by the IHCP. The Prepayment Review Staff recommend removal of the provider from prepayment review once compliance with IHCP guidelines has occurred.

The **Recoupment Specialist** performs activities to collect overpaid or erroneously paid IHCP dollars. The Recoupment Specialist works closely with SUR Reviewers and identified providers to arrange appropriate repayment to OMPP. The Recoupment Specialist coordinates with SUR Supervisors to ensure thorough monitoring and timely follow-up of outstanding collections occurs. They maintain knowledge of basic accounting functions and activities.

The **Member Restricted Card Reviewers** analyze utilization and referrals of misuse or overutilization of IHCP services. If aberrance is identified, the Member Restricted Card Reviewers implement restrictions of the members via the Restricted Card Program (RCP). The Member Restricted Card Reviewers monitor compliance with IHCP guidelines and determine when a recommendation to remove the member from the RCP is appropriate. The Member Restricted Card Reviewers work closely with EDS, county caseworkers, members, and providers to improve program compliance by members. This occurs in the form of program education and monitored utilization.

The **Member Restricted Card Specialists** initiate, implement, and monitor members of the RCP. The Member Restricted Card Specialists work closely with members and providers to coordinate care and ensure compliance with the program.

The **SUR Support Staff** are responsible for many duties including organizing files, assisting with written reports, maintaining operation calendars and tickler systems, scheduling meetings and arranging for any special equipment or materials to support the meetings, and operating department equipment.

The SUR department is directly supported by other employees, the Medical Director, and Program Director. The Medical Director has a close working relationship with the SUR department in support of the use of physician consultants in review activities. SUR staff works closely with the Medical Director to enhance appropriate review decisions and subsequent actions.

### **C. SUR Staff Orientation and Training**

SUR Staff will complete an extensive orientation, encompassing all aspects of SUR function. Topics reviewed will include.

- Audit process
- Entrance and Exit Guidelines
- Off-site Reviews
- Statistical Sampling
- Internet/Legal Research
- IHCP Overview
- IndianaAIM Training
- Recoupment
- Program Integrity Case Identification
- SURS Database
- Records Retention and Storage

Theories presented by Malcolm Sparrow in the area of fraud and abuse detection are incorporated in the SUR orientation process.

**Exhibit II - 1**  
**SURVEILLANCE AND UTILIZATION REVIEW (SUR)**  
**ORGANIZATIONAL CHART**

